

Young / Sommer LLC

ATTORNEYS AT LAW

MAIN OFFICE (FOR ALL MAIL): 500 FEDERAL STREET, 5TH FLOOR, TROY, NEW YORK 12180
ALBANY OFFICE: 41 STATE STREET, STE 604-12, ALBANY, NEW YORK 12207

Phone: 518-438-9907 • Fax: 518-438-9914

www.youngsommer.com

Joseph F. Castiglione, Esq.
Writer's Telephone Extension: 226
jcastiglione@youngsommer.com

April 28, 2025

Via ECF Only

Hon. Brenda K. Sannes
United States District Court, Northern District of New York
Federal Building and U.S. Courthouse
PO Box 7336
Syracuse, NY 13261-7336

RE: Alaei v SUNY Albany, et al; 21-CV-377 (BKS/TWD); Request for short Extension of Time to Submit Trial Submissions

Dear Judge Sannes:

I am contacting the Court on behalf of the Plaintiff, Dr. Kamiar Alaei ("Plaintiff"), in the above matter. I am writing to respectfully request a brief, four (4) day extension of time to submit Plaintiff's trial submissions, which are due today, April 28, 2025. While recognizing the Court's Trial Schedule, Plaintiff has been endeavoring in good-faith to avoid costs and efforts with some trial preparations/submissions, based upon pending settlement discussions.

In response to a request by defendant's counsel, David White, which was made in the end of March 2025, by email dated April 8, 2025, I wrote to Mr. White on behalf of the Plaintiff to convey and explain Plaintiff's settlement position and offer. Having not heard back, I reached out to Mr. White last week, and we subsequently had a telephone discussion on Wednesday, April 23, 2025. At this time, however, I have not received a response to Plaintiff's settlement offer.

Based upon the parties' efforts, my client was endeavoring in good-faith to hold back on what may have been unnecessary costs etc., however, Plaintiff will

now ensure that all required submissions are prepared and filed by Friday, May 2, 2025. Plaintiff is not making a Motion in Limine.

Based upon the above, I am respectfully requesting that the Court allow the Plaintiff to submit its trial submissions on or by Friday, May 2, 2025. Based upon prior work and efforts, however, Plaintiff will be filing its submissions in a rolling-manner, between today and Friday, if the extension is granted by the Court.

Respectfully submitted,



Joseph F. Castiglione
Bar Roll No. 512406

cc: David C. White, Esq.